

United States District Court  
Eastern District of Michigan  
Southern Division

United States of America,

Case No. 2:19-cr-20246

Plaintiff,

v.

Honorable Denise Page Hood

D-3 Colton Jurisic,

Defendant.

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**SECOND FORFEITURE BILL OF PARTICULARS**

The United States of America, by and through its counsel, MATTHEW SCHNEIDER, United States Attorney and SHANKAR RAMAMURTHY Assistant United States Attorney, files this Second Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to provide notice of specific property that the United States intends to forfeit upon conviction of one or more counts of the Indictment (Docket #1). This Second Forfeiture Bill of Particulars incorporates by reference, in its entirety, the Indictment (Docket #1), specifically the Forfeiture Allegation(s) and the forfeiture authority stated therein.

This Second Forfeiture Bill of Particulars is also filed to comply with the provisions of Title 18, United States Code, Section 983(a)(3), and the Government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

Specifically, the United States intends to forfeit the following property pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) together with 28, United States Code, Section 2461(c) upon conviction of one or more counts in this criminal action:

- a) 0.5040000000 of Cardano virtual currency from Defendant Colton Jurisic's Binance Account;
- b) 305094.1710000000 of Basic Attention Token virtual currency from Defendant Colton Jurisic's Binance Account;
- c) 0.0004730000 of Bitcoin Cash ABC virtual currency from Defendant Colton Jurisic's Binance Account;
- d) 0.0007160000 of Bitcoin Cash SV virtual currency from Defendant Colton Jurisic's Binance Account;
- e) 0.0000060500 of Binance Coin virtual currency from Defendant Colton Jurisic's Binance Account;
- f) 0.0000376300 of Bitcoin virtual currency from Defendant Colton Jurisic's Binance Account;
- g) 0.0100000000 of Metal virtual currency from Defendant Colton Jurisic's Binance Account;
- h) 0.6100000000 of Substratum virtual currency from Defendant Colton Jurisic's Binance Account.

This Second Forfeiture Bill of Particulars does not limit the United States from seeking the forfeiture of additional property identified for forfeiture or limit the United States from seeking the forfeiture of substitute assets and/or the imposition of a

forfeiture money judgment pursuant to Title 21, United States Code, Section 853(p).

Respectfully submitted,

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United States Attorney

/s/Shankar Ramamurthy  
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Dated: December 5, 2019

**CERTIFICATION OF SERVICE**

I hereby certify that on December 5, 2019, the foregoing document was filed with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

/s/Shankar Ramamurthy  
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